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Leticia Silva Legal Assistant

April 20, 2021

The Honorable Kimba M. Wood United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007 -Via ECF-

MEMO ENDORSED

Re: USA v. Jorgelina Abreu-Gil 20 Cr. 199 (KMW)

Dear Judge Wood,

Our office represents Ms. Jorgelina Abreu-Gil in the above referenced matter.

On February 14, 2020, Ms. Jorgelina Abreu-Gil was released on a \$500,000.00 Personal Recognizance Bond, with signatures by two (2) Financially Responsible Persons.

As part of her Conditions of Release, Ms. Abreu-Gil was placed under home detention with an electronic monitor.

We respectfully request an amendment to the Conditions of Release allowing the removal of the Electronic Monitor component and allowing the Government to hold Ms. Jorgelina Abreu-Gil's children's passports.

U.S. Pretrial Services Officer Leo Barrios has no objection to this request and reports that Ms. Abreu-Gil remains in full compliance of all regulations. The Government, by way of A.U.S.A. Kedar Bhatia, does not oppose this request.

Thank you for your consideration.

Respectfully submitted,

/S/Telesforo Del Valle Jr.
Telesforo Del Valle Jr., E.N.Y., N.Y.

Del Valle & Associates

Cc: A.U.S.A. Kedar Bhatia, Esq. U.S. Pretrial Services Office

KIMBA M. WOOD U.S.D.J.

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